

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FORMER BL STORES, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 3140

**CERTIFICATION OF COUNSEL REGARDING STIPULATION REGARDING
SEDGWICK CLAIMS MANAGEMENT SERVICES' MOTION FOR ALLOWANCE
AND IMMEDIATE PAYMENT OF ADMINISTRATIVE EXPENSE CLAIMS**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “Debtors”) hereby certify as follows:

1. On February 27, 2025, the Bankruptcy Court entered its *Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, and (III) Granting Related Relief, Including Notice and Filing Procedures* [D.I. 2110, as amended by D.I. 2214] (the “Administrative Expense Procedures Order”), which, among other things, established procedures for the allowance and payment of certain administrative expenses in the above-captioned chapter 11 cases (the “Chapter 11 Cases”).

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Former BL Stores, Inc. (9097); Former Management Stores of Ohio, LLC (7948); Consolidated Property Holdings, LLC (0984); Former Furniture Stores of Ohio, LLC (7868); Former Savings Stores of California, LLC (5262); Former Stores of Ohio, LLC (6811); Former Tenant Stores of Ohio, LLC (0552); Former Savings Stores of Ohio, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Former eCommerce Stores of Ohio, LLC (9612); and Former Low Cost Stores of Ohio, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

2. On September 5, 2025, Sedgwick Claims Management Services (“Sedgwick”) filed the *Sedgwick Claims Management Services’ Motion for Allowance and Immediate Payment of Administrative Expense Claims* [D.I. 3140] (the “Motion”), which, as set forth more fully therein, sought allowance and payment of an administrative expense in the amount of \$614,440.27 (the “Sedgwick Administrative Expense Claim”).

3. The Debtors and Sedgwick have engaged in good faith negotiations and have agreed to enter into a stipulation (the “Stipulation”) to resolve the Sedgwick Motion in light of the Administrative Expense Procedures Order.

4. A copy of the Stipulation is attached as Exhibit A to the proposed form of order (the “Proposed Order”), attached hereto as Exhibit 1.

5. Counsel to Sedgwick has reviewed the Proposed Order and has agreed to its entry.

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WHEREFORE, the Debtors respectfully request that the Court enter the proposed order, substantially in the form attached hereto as **Exhibit 1**, at its earliest convenience.

Dated: October 31, 2025

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